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Before the
Federal Communications Commission
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Support Material for Carriers to File
to Implement Access Charge Reform
Effective January 1, 1988

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MOTION FOR EXTENSION OF TIME

Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell (SWBT, Pacific and Nevada, respectively) (collectively, the SBC Companies), pursuant to Sections 1.41 and 1.46 of the rules of the Federal Communications Commission (Commission), respectfully request an extension of the Tariff Review Plan (TRP) filing deadlines recently established in the Order¹ released November 7, 1997. Pacific Bell and Nevada Bell request that they be allowed to file the TRPs described in the Order on December 12, 1997 rather than on November 26, 1997. Further, the SBC Companies request that they all not be required to file the CAP-1 form from the TRP until December 17, 1997, in conjunction with the actual tariff pages to be filed and the additional TRP forms.

I. BACKGROUND

On November 6, 1997, the Common Carrier Bureau (Bureau) released an order describing the TRPs to be filed in conjunction with the tariffs scheduled to take effect on January 1, 1998 pursuant to the Access Charge Reform proceeding. The following day the Bureau

¹ Support Material for Carriers to File to Implement Access Charge Reform Effective January 1, 1998, Order, (DA 97-2358) (rel. November 7, 1997).

released the Order setting November 26, 1997 as the filing date for most of the TRPs, citing certain excluding forms.

II. BASIS FOR THE REQUEST

A. Request for Pacific and Nevada

Because the demand data does not currently exist in any systems in the required format for some of the new rate elements (e.g., line ports) required by the Access Reform Order filing, the SBC Companies must identify new data sources. The demand data of the three SBC tariff filing entities (SWBT, Pacific and Nevada) is not generated in the same manner. The format and location of the data is often different as the three companies have used different systems. The SBC Companies need time to make sure that "like data" is being used for all three companies and that any fluctuations are explainable. Their goal is to make one quality filing, taking the time to verify the results, rather than filing on November 26 with the unverified data, raising the possibility of having to file errata.

The employees responsible for the filing have also been working on other issues such as the refund in CC Docket No. 85-166. That project, due to the difficulty in finding and in sifting through the data that remains from years past, has, in part, prevented them from preparing as much as possible of the TRPs in advance. In addition, as a result of the consolidation of the functions of the three companies, many of the subject matter experts that previously worked on TRPs have been moved to new responsibilities.

The SBC Companies are also in the process of relocating the regulatory support functions and the interexchange carrier marketing functions of the three companies to Texas during this same time frame.

B. Request for all Three SBC Companies

The SBC Companies assume that the omission of the CAP-1 form from the TRP exclusions listed in paragraph 4 of the Order was an oversight. The CAP-1 form is a rate setting form and cannot be required, according to the Streamlining Order, to be filed prior to filing the tariff.² Under the streamlined tariff filing requirements, the tariff must be filed 15 days prior to the effective date. Thus, the SBC Companies request that they not be required to file the CAP-1 form until the tariff pages and the remaining TRP forms are filed.

C. Good Cause

There is "good cause" to grant the motion. The extension for Pacific and Nevada would allow the SBC Companies to check the filing for consistency and could prevent an errata filing. The extension for the CAP-1 form is warranted because under the Streamlining Order, it should not be required to be filed until the actual rates are filed on 15 days' notice.³ The short time frame set in the Order, and the new requirements of the Tariff Review Plans, prevent the SBC Companies from adding and educating additional skilled personnel to advance the filing

² Implementation of Section 402(b)(1)(A) of the Telecommunications Act of 1996, Report and Order, (FCC 97-23) (rel. January 31, 1997) (Streamlining Order).

³ The justification for requiring TRPs to be filed prior to annual filings was that the TRPs "do not contain proposed rates" and that they are not "dependent on a LEC's specific rates." Streamlining Order at para. 101. Neither of these factors are correct for the CAP-1 form.

dates. The available personnel are already working evenings and weekends to complete the filing.

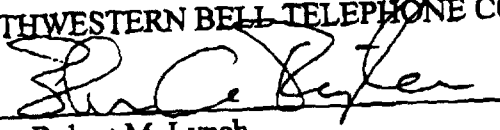
III. CONCLUSION

For the foregoing reasons, Pacific and Nevada request that they be allowed to file certain of the TRP forms on December 12, 1997. Further, the SBC Companies request that they all not be required to file the CAP-1 form from the TRP until December 17, 1997, in conjunction with the actual tariff pages to be filed.

Respectfully submitted,

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November 12, 1997

CERTIFICATE OF SERVICE

I, Brenda K. Dinan, hereby certify that the Motion for Extension of Time of Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell, Docket DA 97-2358, has been served November 12, 1997, to the Parties of Record.

Brenda K. Dinan

Brenda K. Dinan

November 12, 1997

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